

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
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November 3, 2000

Instruction Memorandum No. MT-2001-006

Expires: 9/30/2002

To: State Management Team

From: State Director

Subject: Modification of Production Equipment to Prevent Wildlife Mortality
(WO IM 95-93)

Portions of this instruction memorandum (i.e., inspections by petroleum engineering technicians and issuing letters to oil and gas operators) only apply to the Miles City and North Dakota Field Offices and the Oil and Gas Field Station in Great Falls.

The results of previous inspections over a 4-year period show wildlife mortalities from open-vent exhaust stacks are rare in Montana and the Dakotas. We appreciate all of your effort conducting inventories and working with operators during this review. A significant number of facilities have been equipped with vent stack covers to effectively deter bird use (Attachment 1). The oil and gas industry is continuing to equip new facilities voluntarily in some areas within the three states. These actions are taking place in parts of the Williston Basin and the Cedar Creek Anticline.

Our policy on the subject issue is outlined in this memorandum. This policy includes continued industry involvement and inspections of dismantled equipment, if it is feasible to conduct this type of inspection during inspections scheduled for other priorities. Our policy also includes observations for bird and bat fatalities and uses during all oil and gas inspections, and conditions for requiring measures to effectively deter bird and bat usage of open vent stacks. Evidence of bird and bat use may include droppings on tanks, tracks, or nesting material. We are interested in bird and bat use around production facilities because such use could result in perching, entry, or nesting activity in or around open-vent stacks. Use of open-vent stacks is more likely if oil and gas production equipment runs intermittently (e.g., equipment shuts down for periods based on pressure, temporarily abandoned and shut in wells).

A notification letter should be sent to your operators. This letter should remind operators that we are still concerned about potential wildlife mortalities, and it should also ask for cooperation to eliminate possible impacts by voluntarily installing protective devices during repairs or installation of new equipment.

Inspections of dismantled equipment should continue if activity conducted in your area provides opportunities and can be completed as part of a previously scheduled inspection. Even though inspections of dismantled equipment are not required during routine inspections, all normal BLM inspection and enforcement (I&E) activities must include investigations and documentation to identify bird and bat use of production facilities and mortalities. This should include observations of all land dedicated to production activities, with special emphasis for areas around production equipment exhaust stacks. Such observations should be conducted by petroleum engineering technicians during all drilling, production, and abandonment inspections. In addition, these observations should be included as part of any inspections conducted by either minerals resource specialists or natural resource specialists. If mortalities are discovered, or you determine facilities are being used by birds or bats, your findings should be reported to the minerals resource specialist or natural resource specialist for further investigation and documentation. This investigation should be used to determine if a written order is necessary for modification of existing equipment with protective devices to effectively deter bird and bat use of open-vent stacks.

Questions on this matter should be directed to Jim Albano at (406) 896-5111.

Signed by: Roberta A. Moltzen

Authenticated by: Rosetta Deines (MT-922)

1 Attachment

1-[Photo of Production Facilities North of Baker Montana](#) (1 p)

Distribution (w/attms)

Havre FS

Glasgow FS

Great Falls Oil and Gas FS

FS, Region 1-1

WO-310, LS, Rm. 501-1

WO-230, LS, Rm. 204-1

MT-923, Attn. Roxanne Falise-1

bc: (w/o attms)

All BLM SOs